



June 1, 2022

**VIA EMAIL**

Office of the Governor  
Patrick Henry Building  
1111 East Broad Street  
Richmond, Virginia 23219  
[foia@governor.virginia.gov](mailto:foia@governor.virginia.gov)

**Re: Virginia Freedom of Information Act Request**

Dear FOIA Officer:

Pursuant to the Virginia Freedom of Information Act, Va. Code Ann. § 2.2-3700, I, Anisha Hindocha, a resident of Virginia, make the following request for records.

**Requested Records**

I request that the Office of the Governor produce the following records within five working days:

1. All calendars or calendar entries for Matt Moran, including any calendars maintained on behalf of Moran.

I request that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars; I request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used to track or coordinate how Moran allocates his time on executive business.

2. Any conflicts, ethics waivers or authorizations issued for Matt Moran.
3. Records reflecting any recusal determinations made or issued for Matt Moran, including a copy of any arrangements made between Moran and the counsel's office in the Office of the Governor regarding his terms of employment.
4. Records sufficient to identify any titles or formal roles held by Matt Moran in connection with the Office of the Governor.
5. Any formal or informal agreements between the Office of the Governor and Matt Moran related to positions held by Moran.
6. All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) between (a) Matt Moran and (b) anyone

communicating on behalf of Creative Direct or LINK Public Affairs, including but not limited to communications from email addresses ending in @creativedirect.net or @linkpublicaffairs.com.

7. Copies of any contracts between the Office of the Governor and Creative Direct or LINK Public Affairs.
8. All records reflecting any actual or projected expenditures for renovations or redecorations (including remodeling or changes to décor) of any part of Matt Moran's office or office suite (including foyers, waiting rooms, conference rooms, adjacent hallways, or other common areas).

Please provide all responsive records from January 15, 2022, through the date the search is conducted.

Please notify me of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

### **Guidance Regarding the Search & Processing of Requested Records**

In connection with its request for records, I provide the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. I seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions.
- My request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to this request, this request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in

files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to me, please do not hesitate to reach out to my counsel at the contact information listed below to discuss this request. We welcome an opportunity to discuss this request with you before you undertake your search or incur search or duplication costs. By working together at the outset, we can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email to the address listed below. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to Anisha Hindocha, c/o American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

### **Conclusion**

We share a common mission to promote transparency in government. I look forward to working with your agency on this request. If you do not understand any part of this request, please contact Rachel Baron at [records@americanoversight.org](mailto:records@americanoversight.org) or 202.897.2465.

Sincerely,

/s/ Anisha Hindocha  
Anisha Hindocha